

Exhibit A

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA

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THE CITY OF HUNTINGTON,

Plaintiff,

vs.

CIVIL ACTION
NO. 3:17-01362

AMERISOURCEBERGEN DRUG
CORPORATION, et al.,
Defendants.

CABELL COUNTY COMMISSION,
Plaintiff,

vs.

CIVIL ACTION
NO. 3:17-01665

AMERISOURCEBERGEN DRUG
CORPORATION, et al.,

Defendants.

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Videotaped and videoconference deposition
of GEORGE A. BARRETT taken by the Defendants under
the Federal Rules of Civil Procedure in the above-
entitled action, pursuant to notice, before Teresa
S. Evans, a Registered Merit Reporter, all parties
located remotely, on the 21st day of September,
2020.

1 why didn't you look into whether or not there were
2 any costs that the County or City was paying in
3 connection with the abatement interventions that
4 were currently underway at the time you wrote your
5 report?

6 A. Well, the scope of my work was limited to
7 calculating the future value of the costs which had
8 been identified in Doctor Alexander's redress
9 model, which is supplemented or augmented by Doctor
10 Young's opinions as well.

11 Whether or not programs currently
12 exist or don't exist in the Cabell/Huntington area
13 is really beyond the scope of my work in the case.
14 It just simply doesn't matter.

15 I was asked to calculate the future
16 value of all the items identified in the redress
17 model.

18 Q. Well, if the County or City had currently
19 been incurring costs for an abatement program that
20 was in Doctor Alexander's plan, wouldn't you
21 consider that important evidence to determine what
22 the costs might be in the future for the same plan?

23 A. I really can't speak to that because it's
24 outside of my field of expertise. As a practical

1 exist anymore. Just a lot of defense firms in the
2 area. All through the southeast, essentially.

3 Q. And are there any defendant parties for
4 whom you have done repeat work?

5 A. I don't understand your question.

6 Q. Are there any companies who have been
7 defendants in lawsuits for whom you have done more
8 than one case?

9 A. I don't even really look at the names of
10 the companies when I do the work. My focus is on
11 the plaintiff, as that's the person who's
12 experiencing the loss.

13 Q. Now, with regard to the medical costs,
14 medical-related costs that were given to you by
15 Doctor Alexander, did you make any effort to
16 determine whether the City or County had ever
17 previously paid for any similar type
18 medical-related costs?

19 A. No, I did not.

20 Q. Are you aware of any medical-related costs
21 that the County or City currently pays?

22 A. I have not looked at that, no.

23 Q. Now, for purposes of the cost calculations
24 that you've done in your report, have you made any